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**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

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**XIONGEN JIAO, an individual, QIANJI JIAO, an individual, ZHONGHUA YI, an individual, PENGFEI ZHOU, an individual, XUAMEI ZHOU, an individual,**

***Plaintiffs,***

**vs.**

**NINGBO XU, an individual, and LCL COMPANY, LLC, a Texas Limited Liability Company,**

***Defendants,***

**and**

**DONGTAI INVESTMENT GROUP, LLC, a Texas Limited Liability Company,**

**Nominal Defendant.**

**Case No.: 4:19-CV-01848**

**Judge: Hon. Keith P. Ellison**

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**RECEIVER'S NOTICE TO COURT & REQUEST TO SUSTAIN OBJECTIONS  
AND DISALLOW CLAIMS NO. 8 AND 9**

Ronald J. Sommers, Receiver ("Receiver") for Dongtai Investment Group, LLC ("DIG"), pursuant to this Court's Order establishing procedures for the adjudication of claims (Dkt. 193), files this Notice to Court and Request to Sustain Objections and Disallow Claims No. 8 and 9.

**NOTICE & REQUEST TO SUSTAIN OBJECTIONS**

1. On February 28, 2023, the Court entered its Order establishing claim objection procedures in this matter. (Dkt. 193). Pursuant to the Order, the Court required that any interested party file a written objection to any claim by March 30, 2023. (*Id.* at 2). The Order further required that any entity having a claim to which an objection had been lodged to file a response, if any, to the claim objection by April 29, 2023. (*Id.*). Because that deadline fell on

a Saturday, it was extended to Monday, May 1, 2023, by operation of the Federal Rules of Civil Procedure.

2. The Receiver and other parties timely filed objections to the following claims:

- Receiver's Objection to Claim No. 8 of United Air Services, filed on March 14, 2023 (Dkt. 196).
- Receiver's Objection to Claim No. 12 of Hewlett-Packard Financial Services Company, filed on March 14, 2023 (Dkt. 197).
- Receiver's Objection to Claim No. 6 of Peter Hui and Hospitality Unlimited Investments, Inc., filed on March 20, 2023 (Dkt. 199).
- Receiver's Objection to Claim No. 10 of Property Care Services, LLC, filed on March 24, 2023 (Dkt. 201)
- Plaintiffs' Objection to Claim No. 6 of Peter Hui and Hospitality Unlimited Investments, Inc., filed on March 29, 2023 (Dkt. 202)
- Receiver's Objection to Claim No. 9 of the Estate of Michael S. Udayan, filed on March 29, 2023 (Dkt. 203)
- Plaintiffs' Objection to Claim No. 8 of United Air Services, filed on March 31, 2023 (Dkt. 204)
- Plaintiffs' Objection to Claim No. 9 of the Estate of Michael S. Udayan, filed on March 31, 2023 (Dkt. 205)
- Plaintiffs' Objection to Claim No. 10 of Property Care Services, LLC, filed on March 31, 2023 (Dkt. 206)

3. Timely responses to those objections were received from the following claimants:

- Peter Hui and Hospitality Unlimited Investments, Inc.'s Response to Objection, filed on April 28, 2023 (Dkt. 210)
- Property Care Services, LLC's Response to Objection, filed on May 1, 2023 (Dkt. 211)
- Hewlett Packard Financial Services' Response to Objection, filed on May 1, 2023 (Dkt. 213)

4. By virtue of the Claimants' failure to respond to the timely objections, Receiver represents that the following Objections are ripe for consideration by the Court at this time:

- Receiver's Objection to Claim No. 8 of United Air Services, filed on March 14, 2023 (Dkt. 196)
- Receiver's Objection to Claim No. 9 of the Estate of Michael S. Udayan, filed on March 29, 2023 (Dkt. 203)
- Plaintiffs' Objection to Claim No. 8 of United Air Services, filed on March 31, 2023 (Dkt. 204)
- Plaintiffs' Objection to Claim No. 9 of the Estate of Michael S. Udayan, filed on March 31, 2023 (Dkt. 205)

WHEREFORE, Receiver respectfully requests that the Court, upon consideration of the Objections filed in this matter, sustain the objections to Claim No. 8 of United Air Services and Claim No. 9 of the Estate of Michael S. Udayan, grant the relief requested in the objections and disallow Claim No. 8 and Claim No. 9 in full. Receiver also requests such other and further relief as is just.

Respectfully Submitted,

**NATHAN SOMMERS JACOBS  
A PROFESSIONAL CORPORATION**

By: /s/ Iain L. C. Kennedy

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**ATTORNEYS FOR RONALD J. SOMMERS,  
RECIEVER**

**CERTIFICATE OF SERVICE**

The undersigned certifies that on May 3, 2023, a true and correct copy of the foregoing was served electronically on all parties registered to receive electronic notice of filings in this case via this Court's ECF notification system. The undersigned further certifies that the foregoing was served upon all parties listed below no later than the next day after the filing of the foregoing.

Qianju Jiao C/O Mosaic Paradigm Law Group Pc 10370 Richmond Ave., Suite 850 Houston, Texas 77042	Stephanie G. Udayan c/o Heidi A. Weelborg Weelborg Law, PLLC 2121 Sage Road, Suite 100
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Natura A-R Janice Confer 6436 Babcock Rd. San Antonio, Texas 78249	Estate of Michael Udayan c/o Stephanie Clarke Davis, Court-appointed Temporary 3rd Party Dependent Administrator 1117 FM 359, Ste. 200 Richmond, Texas 77406
Peter Hui & Hospitality Unlimited c/o The Mussalli Law Firm 24 Waterway Ave Ste 830 Spring, TX 77380-4324	Property Care Services LLC c/o T. Michael Neville 26314 Wedgewood Park Lane Cypress, Texas 77433
United Air Services c/o Noe Llamas 2815 Connorvale Rd. Houston, TX 77039	Stacey L. Barnes Kearney, McWilliams & Davis, PLLC 55 Waugh Drive, Suite 150 Houston, Texas 77007
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/s/ Iain L.C. Kennedy

Iain L.C. Kennedy